Memorandum

Members, Injection Surveillance Committee Date : June 28, 1983

Subject: Resume of Injection Surveillance Committee Meeting, April 26, 1983

From : Department of Conservation—Division of Oil and Gas

Following are comments and decisions on recommendations in your memo of May 11, 1983.

Item 2. Lap tests on injection wells. We concur with your recommendation that laps in injection wells should be tested by either a conventional fluid-entry test or by a pressure test, at the discretion of the Division. A section will be added to the regulations to require such testing.

Item 6. Suggested changes to Sections 42 and 43 of the MOI.

- a. Deletion of parenthetical phrase in Exhibit 43.2, Item 1. This phrase merely emphasizes that aquifers must be exempted by EPA prior to approval for injection and it should be retained.
- b. Deletion of Section 42.2A, parts 2a, 3a, 4a, and 5a. These criteria for aquifer exemption are established by EPA and must be retained.
- c. Section 42.14.2. This section requiring casing pressure tests of old wells to be converted to injection should be retained as currently worded.
- d. Section 42.6c. Copies of P-reports are no longer sent to RWQCB. This section will be clarified to show distribution. However, many engineers feel that the notes on the P-report regarding freshwater protection are a good reference and should be retained.

Item 7. Issuance of T-report disapproving surveys. We concur that a T-report should be issued when an injection survey is disapproved and is not to be rerun immediately. Section 42.14.2 will be revised to show this.

Simon Cordova

Acting Chief

Division of Oil and Gas

cc: All Deputies

- D. Lande
- D. Stockton
- B. Ingram
- B. Keid